

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

KEITH RANIERE, CLARE BRONFMAN,  
ALLISON MACK, KATHY RUSSELL,  
LAUREN SALZMAN, and NANCY SALZMAN,

Defendants.

Case No. 1:18 Cr. 00204-NGG

**NOTICE OF MOTION TO DISMISS**

PLEASE TAKE NOTICE that, upon the attached Declaration of William F. McGovern, counsel for Defendant Allison Mack, dated November 16, 2018, the exhibit appended thereto, and the accompanying Memorandum of Law, Defendant will move this Court, before the Honorable Nicholas G. Garaufis, at the United States Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, for an order, pursuant to Rule 12(b)(3)(B)(ii) and (v) of the Federal Rules of Criminal Procedure, dismissing the Superseding Indictment, or in the alternative, an order directing the government to provide a bill of particulars, and for such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that Defendant hereby joins the following Motions: (i) Clare Bronfman, Kathy Russell, and Nancy Salzman's Motion to Dismiss Count One of the Superseding Indictment; (ii) Lauren Salzman's Motion to Dismiss Racketeering Acts Seven of the Superseding Indictment; and (iii) Keith Raniere's Motion to Dismiss Racketeering Act Eight of the Superseding Indictment.

Dated: November 16, 2018  
New York, New York

Respectfully submitted,  
KOBRE & KIM LLP

/s/ William McGovern

William F. McGovern  
Sean S. Buckley  
800 Third Avenue  
New York, New York 10022  
Tel: 212 488 1210 / 1253  
William.McGovern@kobrekim.com  
Sean.Buckley@kobrekim.com

*Attorneys for Defendant Allison Mack*